

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
CLEVELAND DIVISION**

JOSEPH M. KING,	:	Case No. 1:18-cv-00488-DCN
	:	
Plaintiff,	:	Judge Donald C. Nugent
	:	
v.	:	<b><u>DEFENDANTS' MOTION TO ADMIT</u></b>
	:	<b><u>TERRY P. FINNERTY PRO HAC VICE</u></b>
G4S SECURE SOLUTIONS (USA) INC.,	:	
et al.,	:	
	:	
Defendants.	:	

Defendants respectfully request that Terry P. Finnerty, Esq. be admitted in this matter to practice before the United States District Court for the Northern District of Ohio *pro hac vice*. As set forth in the accompanying Memorandum in Support and Affidavit of Terry P. Finnerty filed contemporaneously herein, Mr. Finnerty is admitted to practice in the State of Georgia, and in the United States District Courts for the Southern, Middle and Northern Districts of Georgia. Terry P. Finnerty will serve as lead trial counsel in this case.

**MEMORANDUM IN SUPPORT**

Defendants respectfully request that Terry P. Finnerty, Esq. of **Dinsmore & Shohl LLP, 1100 Peachtree Street NE, Suite 950, Atlanta, Georgia 3039, Telephone: (470) 300-5338, Email: [terry.finnerty@dinsmore.com](mailto:terry.finnerty@dinsmore.com)**, be admitted *pro hac vice* to practice before the United States District Court for the Northern District of Ohio in this case.

Attorney Terry P. Finnerty is licensed to practice law in the State of Georgia and has been a member in good standing since he was admitted to practice in 1989. (See Affidavit of Terry P. Finnerty, ¶ 1 and ¶ 2).

Finally, Attorney Terry P. Finnerty has never been disbarred or suspended from practice before any court, department, bureau or commission of any State or the United States, and has

not been reprimanded by any such court, department, bureau or commission pertaining to his conduct or fitness as a member of such bars. (*See* Affidavit of Terry P. Finnerty, ¶3).

Accordingly, Defendants respectfully requests that this Court grant its Motion to Admit Terry P. Finnerty, Esq. *pro hac vice* in this matter. A proposed Entry granting this Motion is submitted contemporaneously herein.

Respectfully submitted,

/s/ Charles M. Roesch

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Attorney for Defendants

**CERTIFICATE OF SERVICE**

I hereby certify that on September 24, 2018, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the all CM/ECF participants.

/s/ Charles M. Roesch